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August 15, 2023

VIA ELECTRONIC FILING

Hon. Therese Wiley Dancks
Magistrate Judge
United States District Court, NDNY
100 South Clinton Street
PO Box 7346
Syracuse, NY 13261

Re: *Vengalattore v. Cornell University*
Civil Action No. 3:18-cv-01124-GLS-TWD

Dear Magistrate Judge Dancks:

We represent Cornell University. We write on behalf of both parties to request an extension in the discovery deadline and the deadline to file dispositive motions.

The parties have proceeded diligently through discovery. Written discovery is substantially complete. We have deposed the Plaintiff. Plaintiff has deposed a 30(b)(6) witness from Cornell University, and is scheduled to complete the depositions of two additional Cornell University witnesses this week.

While we have made significant progress in discovery, the parties request an extension to enable us to complete the scheduled depositions, review deposition transcripts and complete any supplemental discovery that is required based on witness testimony.

Accordingly, we request that the discovery deadline be extended up to and including October 2, 2023. We further request that the deadline to file dispositive motions be extended up to and including November 21, 2023.

If this meets with the Court's approval, please "so order."

Respectfully submitted,
BOND, SCHOENECK & KING, PLLC

/s/Suzanne M. Messer

Suzanne M. Messer, Esq.

cc: Counsel of Record (via ECF)